



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Evan Bayh
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OFFICE OF RCRA
WASTE MANAGEMENT DIV
EPA, REGION V

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August 20, 1993

VIA CERTIFIED MAIL P 215 679 806
Ms. Susan Sylvester
U.S. EPA, Region V
77 West Jackson Blvd.
Chicago, Illinois 60604

Dear Ms. Sylvester:

Re: RCRA Facility Investigation
Draft Final Report
Franklin Power Products
Franklin, Indiana
EPA I.D. No. IND 044 587 848

The Indiana Department of Environmental Management (IDEM) has reviewed Franklin Power Products' April 27, 1993, RCRA Facility Investigation (RFI). Comments are attached.

If you have any questions regarding this matter, please contact Ms. Ruth Williams of my staff at 317/233-4623.

Sincerely,

Michael E. Sickels, Chief
Corrective Action Section
Hazardous Waste Management Branch
Solid and Hazardous Waste
Management

RW/rgw

cc: Fayola Wright, USEPA
William Buller, USEPA

COMMENTS
Franklin Power Products
Franklin, Indiana
IND 044 587 848

Soil background levels should be site specific, not obtained from generalized publications such as James Dracun's *Elements in North American Soils* (1991). Since the agricultural land is apparently not affected by the facility's operations, soil borings should not be difficult to locate there.

IDEM does not recognize the example soil and groundwater action levels in the proposed RCRA Subpart S table as acceptable ARARs.

The report does not propose any further actions, nor does it propose no further action.